

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DOW JONES & COMPANY, INC. and NYP
HOLDINGS, INC.,

Plaintiffs,

v.

PERPLEXITY AI, INC.,

Defendant.

Civil Action No. 1:24-cv-07984-KPF

**DECLARATION OF LIANE PHAM IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

I, Tram Anh Phun, declare and state as follows:

1. My legal name is Tram Anh Phun. In my professional life, I am known by the name Liane Pham. I am the Workplace Experience Manager at Perplexity AI, Inc. (“Perplexity”) and submit this declaration in support of Defendant’s Motion to Dismiss or, in the Alternative, to Transfer Venue. Unless stated otherwise, all facts stated herein are within my personal knowledge.

2. I have been the Workplace Experience Manager at Perplexity since April 2024. I have detailed personal knowledge regarding Perplexity’s facilities, personnel, and business operations. If called upon, I would be willing to testify as set forth in this declaration.

3. I have read the Second Amended Complaint filed by Plaintiffs in this Action and understand Plaintiffs have alleged, in part, that this Court has personal jurisdiction over Perplexity in the Southern District of New York.

Perplexity’s Operations

4. Perplexity is incorporated under the laws of Delaware.

5. Perplexity’s headquarters and principal place of business are in San Francisco, California. I understand that Perplexity located its headquarters there due, in part, to its many critical connections and partnerships in California, which have been instrumental to Perplexity’s development and creation of its search engine product and to the continued development of that product today. I understand that Perplexity’s proximity to its partners in California—including to companies developing generative AI products—has been critical to facilitating this relationship and developing Perplexity’s business.

6. The majority of Perplexity’s employees live in and work from California. This includes most of Perplexity’s leadership team, as well as its team of engineers involved in the

design and operation of Perplexity's search engine. As of October 21, 2024, out of Perplexity's 110 employees, only ten worked from New York. Those employees' job titles are:

- i. Member of Technical Staff (6)
- ii. Founding Sales Lead
- iii. General Manager, Finance
- iv. Chief Strategy Officer
- v. Engineering Manager

7. It is my understanding that the development of Perplexity's search engine technology, including the development and maintenance of the index of content that it relies upon, is primarily performed and overseen by Perplexity employees in California.

8. Perplexity rents office space from Industrious, a co-working facility, located at 215 Park Avenue South, 11th Floor, New York, New York 10003, which serves as a workspace for its New York-based employees when they are not working remotely. Perplexity's lease with Industrious covers under twenty seats.

Perplexity's Search Engine

9. Perplexity is a software company working to develop an internet search engine that uses artificial intelligence to provide complete, transparent, and verifiable responses to user queries.

10. Perplexity's search engine was created and developed at Perplexity's headquarters in San Francisco, California. The majority of the engineers that work on the search engine on a day-to-day basis are based in California, with a minority in Austin, Texas and various remote locations.

11. I understand that the engineers located in New York are largely responsible for back-end infrastructure—for example, maintaining Perplexity’s website.

12. Other aspects of operations related to development of the search engine similarly take place outside of New York. For example, I understand that the computers used to develop the search engine, including Perplexity’s source code, are in California, and Perplexity’s servers are in northern Virginia.


13. Perplexity offers its search engine to users in every part of the country subject to the same Terms of Service. I understand that at no point has Perplexity marketed its search engine specifically or differently to users in New York, or targeted users in New York, and it has no plans to do so.

14. Perplexity oversees marketing efforts from its California headquarters and generally strives for a global reach in its marketing practices. Perplexity has not undertaken any advertisements for its product that target New York consumers specifically, and does not plan to do so in the future.

15. Perplexity’s Campus Strategist program recruits college students nationwide to volunteer with the company to develop campus-specific marketing campaigns. These student volunteers do not perform any technical or engineering functions and do not develop or maintain any part of the search index.

I declare under penalty of perjury that to the best of my knowledge, information, and belief, the foregoing is true and correct.

Executed on February 18, 2025, at San Francisco, California.


Tram Anh Phun